

Attorneys at Law 287 Park Avenue South, Suite 337 New York, New York 10010

Frank A. Ortiz (1930 to 2016) Norma E. Ortiz Tel. (718) 522-1117 Fax (718) 596-1302 email@ortizandortiz.com

June 3, 2025

Hon. Sean H. Lane U.S. Bankruptcy Court 300 Quarropas Street White Plains, New York 10601

> Re: Santiago Quezada Sr. Case No. 24-22431-shl Chapter 11

Dear Judge Lane:

I am in receipt of the letter filed by the above-captioned Debtor opposing the dismissal of his case filed as Ecf No. 83 (the "Letter"). I received notice of this filing from an ECF notice.

Although I have spent the last 2.5 hours reviewing my firm's emails to prepare a response to the Letter, I respectfully request until no later than Friday, June 6th, at 5:00 p.m., to respond to the Letter. I believe that there are a number of inaccurate factual assertions in the Letter that require my response and I intend to provide the Court with documents in support of my response.

Although there has been no order entered dismissing this case, and I presume there is no deadline to respond to the Letter, I respectfully inform the Court that I intend to file the Letter by Friday, June 6th, by 5:00 p.m.

Thank you in advance for your time and consideration.

Very truly yours,

s/Norma E. Ortiz

Norma E. Ortiz

cc: (By email) Santiago Quezada Jr, Argilio Rodriguez, Esq., Martin Restituyo, Esq., Jeffrey Chuback, Esq., Kate Aiello, Esq., Rachael Siegel. Esq.